

December 20, 2005

Mary L. Cottrell, Secretary ,
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

RE: D.T.E. 05-85

Dear Secretary Cottrell:

I am enclosing the Petition for Leave to Intervene of Massachusetts Electric Company d/b/a National Grid in the above-captioned proceeding. Thank you very much for your time and attention to this matter.

Very truly yours,


Amy G. Rabinowitz

cc: Robert N. Werlin

)	
Boston Edison Company, Cambridge)	
Electric Light Company, Commonwealth)	D.T.E. 05-85
Electric Company d/b/a NSTAR Electric)	
And NStar Gas Company)	
)	

Massachusetts Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby submits this petition to the Department of Telecommunications and Energy (“Department”) for leave to intervene as a party in the above-captioned proceeding, pursuant to 220 CMR 1.03(1)(e). The Company states the following in support of its petition:

1. National Grid is a Massachusetts distribution company subject to the regulatory jurisdiction of the Department with a principle place of business at 55 Bearfoot Road, Northborough, Massachusetts 01532.
2. National Grid provides distribution service, including default service (also referred to as basic service) to customers not procuring electricity from competitive supply, in 168 cities and towns in Massachusetts.
3. In this proceeding, the Department is reviewing the request of Boston Edison Company, Cambridge Electric Light Company, Commonwealth Electric Company (together “NStar Electric”) and NStar Gas Company (“NStar Gas”) for approval of a rate settlement agreement (“Settlement”) entered into with the Attorney General of the

Commonwealth of Massachusetts, the Low-Income Energy Affordability Network, and the Associated Industries of Massachusetts.

4. Overall, the Settlement provides for (1) NSTAR Electric rate changes on January 1, 2006 and May 1, 2006, (2) a performance-based rate mechanism for NSTAR Electric beginning January 1, 2007 and extending through December 31, 2012, (3) NSTAR Gas rate changes on January 1, 2006, (4) an expansion of NSTAR Electric's storm fund, (5) the implementation of new procurement programs for NSTAR Electric basic service customers, (6) the implementation of a fixed-price option for NSTAR Gas residential and small commercial default service customers, (7) the implementation of service quality, safety and reliability programs, (8) the implementation of a low-income arrearage management program, and (9) the preparation of an annual capital projects scheduling list.

5. On December 7, 2005, the Department issued a Notice of Filing and Public Hearing ("Notice") stating that any person wishing to participate in the above-captioned proceeding must file a petition with the Department by December 20, 2005.

6. In conducting adjudicatory hearings, the Department may "allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose" as the Department may order. Mass. Gen. Laws, c. 30A, § 10; see also 220 CMR 1.03(1)(b).

7. The Department's resolution of several of the issues in the proceeding, including performance based rates, electric supply procurement, service quality, safety, and

reliability, may substantially and specifically affect National Grid, a regulated distribution company.

8. In addition, given its position as a regulated distribution company, National Grid has information regarding these issues which can aid the Department in its evaluation of this proceeding.

9. Department precedent supports the participation of regulated utilities in regulatory proceedings of other utilities when important policy matters of significant precedential value are under review. *Massachusetts Electric Company*, D.T.E. 98-69 (review of alternative streetlighting tariff); *Boston Edison Company*, D.T.E. 97-86 (sale of electric generating plants); *Massachusetts Electric Company*, D.P.U. 96-25 (review of electric restructuring settlement); *Boston Gas Company*, D.P.U. 96-50 (review of performance-based ratemaking proposals); *Cambridge Electric Light Company/Commonwealth Electric Company*, D.P.U. 91-234-A (integrated resource management proceeding); *NYNEX*, D.P.U. 94-50 (alternative regulation/performance-based regulation plan).

10. MEC requests that all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to the persons identified below:

Amy G. Rabinowitz
Assistant General Counsel
National Grid
25 Research Drive
Westboro, MA 01582
amy.rabinowitz@us.ngrid.com

WHEREFORE, National Grid respectfully requests that the Department allow its petition for leave to intervene in this proceeding.

Respectfully submitted,

MASSACHUSETTS ELECTRIC COMPANY
D/B/A NATIONAL GRID

By its attorney,

A handwritten signature in black ink, reading "Amy G. Rabinowitz". The signature is written in a cursive, flowing style.

Amy G. Rabinowitz
25 Research Drive
Westboro, MA 01582

Dated: December 20, 2005